

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                                )  
                                )  
v.                            )       Case No. 21-cr-30028-MGM  
                                )  
                                )  
BENJAMIN SHACAR,          )  
                                )  
Defendant.                  )

**MOTION FOR EXCLUDABLE DELAY**

The United States of America, by and through its attorneys, United States Attorney Rachael S. Rollins and Assistant United States Attorney Neil L. Desroches, moves for an order of excludable delay under the Speedy Trial Act that the time from March 3, 2022, the date of the expiration of the current period of excludable delay, until January 11, 2024 the date that the matter was heard by the Magistrate Judge to address the defendant's discovery requests.

Counsel for the defendant, William J. O'Neil, Esq., assents to this motion. In support of this motion, the Government states that it moved orally for such exclusion at each court event and the defendant assented to each request. The Government now files the instant motion to memorialize its motions.

The ends of justice are served by excluding this time from the calculation of the time within which the trial must begin outweighs the best interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A) and Local Rule 112.2. A proposed order of

excludable delay is attached.

Respectfully submitted,

JOSHUA S. LEVY  
UNITED STATES ATTORNEY

By: /s/ Neil L. Desroches

Neil L. Desroches

Assistant United States Attorney

Dated: January 12, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Neil L. Desroches

Neil L. Desroches

Assistant United States Attorney